

February 15, 2022

VIA ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

***Schansman, et al. v. Sberbank of Russia PJSC, et al., No. 1:19-cv-02985-ALC-GWG (S.D.N.Y.)
Sberbank's Motion for Protective Order Staying Discovery as to Sberbank During Pendency
of Sberbank's Motion to Dismiss for Lack of Subject-Matter Jurisdiction Under the FSIA***

Dear Judge Gorenstein:

In accordance with Your Honor's Individual Practice Rule 2.B, Defendant Sberbank advises the Court that, as ordered by the Court in ECF Nos. 241 and 269, the briefing on Sberbank's letter motion to stay merits discovery pending a decision on its motion for lack of subject-matter jurisdiction under the Foreign Sovereign Immunities Act, 28 U.S.C. §§ 1330, 1602, *et seq.*, is complete. *See* ECF Nos. 244, 248, 252, 267, 268, 272, 283, 289.

Respectfully submitted,

/s/ *Nicole Erb*

WHITE & CASE LLP
Nicole Erb
Claire A. DeLelle
Matthew S. Leddicotte (admitted *pro hac vice*)

DEBEVOISE & PLIMPTON LLP
Mark P. Goodman
William H. Taft V

Counsel for Sberbank of Russia

cc: Counsel of Record (via ECF)

White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005-3807
T +1 202 626 3600

whitecase.com